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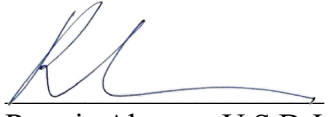
April 6, 2021

Application granted.

**VIA ECF**

SO ORDERED.

The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 2203  
New York, NY 10007

  
Ronnie Abrams, U.S.D.J.  
April 7, 2021

Re: *United States v. Rainedy Cepeda-Nova*, No. 19-cr-799 (RA)

Dear Judge Abrams:

On behalf of our client, Rainedy Cepeda-Nova, we respectfully request that the Court modify the travel conditions of Mr. Cepeda-Nova's pretrial release to permit him to travel to Santo Domingo, in the Dominican Republic, from April 16-April 27, 2021. Mr. Cepeda-Nova previously received Court approval to travel to Santo Domingo from April 1-11, 2021. (ECF No. 16). Upon discovering that his passport was due to expire, he postponed the trip and requested the release of his passport so that he could seek renewal. (ECF No. 17.) The Court approved that request. (ECF No. 18.) Mr. Cepeda-Nova will receive his new passport in time for his proposed departure on April 16. If the Court approves this travel request, he will surrender his renewed and expired passports to Pretrial Services upon returning to the United States on April 27.

We have consulted with the Government and Pretrial Services about this request. Pretrial Services takes no position on international travel, but notes that Mr. Cepeda-Nova has recently graduated from the Young Adult Opportunity Program and is in compliance with his conditions of release.

The Government's position is as follows: "Ordinarily, the Government would oppose this request because of the inherent significant risk of non-return posed by a non-citizen defendant and his family travelling to his country of citizenship. However, given the Court's greater direct familiarity with Mr. Cepeda-Nova by virtue of the Young Adult Opportunity Program, the Government is prepared to defer to the Court's judgment on this matter and takes no position on the request."

Hon. Ronnie Abrams

April 6, 2021

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Respectfully submitted,

/s/ Michael S. Schachter

Michael S. Schachter

Ravi Chanderraj

cc: AUSA Jacob Fiddelman  
U.S. Pretrial Services Officer Rena Bolin